

Via Electronic and Certified Mail

March 6, 2015

Mr. Stephen Tzhone, Superfund Remedial Project Manager Superfund AR/LA Enforcement Section (6SF-RA) U.S. Environmental Protection Agency 1445 Ross Avenue Dallas, Texas 75202

Subject: Monthly Progress Report – February 2015 Arkwood, Inc. Site, Omaha, Arkansas

Dear Mr. Tzhone:

Pursuant to Section IX (B) of the corrected Consent Decree in this matter, the following letter report is Millbrook Distribution Services' (MMI) monthly progress report.

I. CURRENT ACTIVITIES

The following is a general description of Work (as defined in the Consent Decree) activities commenced or completed during this reporting period:

During February, we operated the main water treatment system, collected operational samples and conducted Site maintenance activities. In addition to collecting samples for laboratory analysis of pentachlorophenol, field samples were collected to measure pH, temperature and dissolved oxygen. Water samples were collected on February 11, 2015. The analytical data was forwarded electronically to you and Mr. Mark Moix of the ADEQ at an earlier date and is also attached to this report. A summary of the data is attached for reference. Samples at the spring mouth and weir will continue to be collected once per month until a reduction in frequency is approved by the agency.

We continued to receive analytical data during February associated with the dioxin reassessment and supplemental dye tracing study. Also, the 2014 Annual Report was submitted on February 26, 2015.

II. PROJECT DATA Attached.

III. PROJECTED ACTIVITIES

March: MMI plans to continue ongoing operations and Site maintenance activities. Reports presenting the results from the dioxin reassessment soil sampling (Decision Unit Plan and Sampling) and supplemental dye tracing will be prepared and submitted by March 31, 2015. In addition, the limited sections of the ditch that remain uncovered downgradient of the main water treatment system will be enclosed in a subsurface culvert. This will eliminate exposure to the treated water and sediment between the treatment plant and the detention pond, as discussed during the site visit last fall.

<u>April</u>: MMI plans to continue ongoing operations and Site maintenance activities. <u>May</u>: MMI plans to continue ongoing operations and Site maintenance activities.

IV. PROBLEMS ENCOUNTERED OR ANTICIPATED None.

I certify that the information contained in or accompanying this submission is true, accurate, and complete to the best of my knowledge, information and belief, and that I, as project coordinator, have made reasonable inquiry into its veracity.

If you have any questions regarding this monthly progress report, please do not hesitate to contact me at (608) 848-4134.

Sincerely,

Jean A. Mescher, Project Coordinator Spr. Director, Environmental Services

Enclosure

Copy:

- Mark Moix, ADEQ
- EPA Assistant Regional Counsel (6C-WA) (w/o enclosure)
- Chief, Superfund Enforcement Branch (6H-E) (w/o enclosure)

Arkwood, Inc. Site: Ozone Injection Pilot Study

Date Water Inj O3 Inj Flow Mouth Weir		Vorio	bloo	Carina	DC	ND					
12/8/05 35	Date			Spring Flow	PCP Mouth Weir						
12/9/05 35		TVator inj	COM		Wouth	VVCII					
12/14/05 35		35									
12/15/05 35			1lb/10 a		28						
12/20/05 36											
12/26/05 36	12/20/05	36		27		<5.10					
1/2/06 36	12/26/05	36									
1/9/06	1/2/06	36		21	42.4	35.1					
1/23/06	1/9/06	36		20	32.4	33					
1/30/06 36	1/16/06	36	1lb/10 g	27.5	32.3	<5.00					
2/6/06 36 1lb/10 g 38 <5.10 <5.00 2/13/06 36 1lb/10 g 21 23.9 <5.00	1/23/06	36		34/32	15.9	<5.00					
2/13/06 36	1/30/06	36	1lb/10 g	41	34.3	<5.00					
2/20/06 36 1lb/10 g 21 5.53 4.19J 2/27/06 36 1lb/10 g 26 19.9 <5.00	2/6/06	36		38	<5.10						
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3/6/06 34 1-2 b/10 g 16 25.1 <5.00 3/13/06 33 1-2 b/10 g 57 107 <5.00 3/20/06 32 1-2 b/10 g 48 26.2 <5.00 4/3/06 34 2-3 b/10 g 27 4.09J <5.00 4/3/06 34 2-3 b/10 g 24 11.3 <5.00 4/10/06 33 2-3 b/10 g 16.4 39.3 <5.00 4/11/06 34 2-3 b/10 g 16.4 39.3 <5.00 4/17/06 34 2-3 b/10 g 16 7.0 <5.00 4/27/06 33 2-3 b/10 g 16 7.0 <5.00 4/27/06 33 2-3 b/10 g 16 7.0 <5.00 4/27/06 33 2-3 b/10 g 16 7.0 <5.00 4/29/06 33 2-3 b/10 g 193 28.2 NA 5/1/06 33 2-3 b/10 g 94 23.4 7.16 5/8/06 33 2-3 b/10 g 59 52.3 23.3 5/15/06 34 2-3 b/10 g 59 52.3 23.3 5/15/06 34 2-3 b/10 g 16 <5.00 <5.00 5/22/06 34 2-3 b/10 g 16 <5.00 <5.00 5/22/06 34 2-3 b/10 g 16 <5.00 <5.00 5/20/06 34 2-3 b/10 g 16 <5.00 <5.00 5/30/06 34 2-3 b/10 g 16.7 5.64 <5.00 6/12/06 0 0 3 253 <5.00 6/12/06 0 0 0 2.19 LE LE 6/19/06 34 0 16.7 52.1 14.3 6/26/06 34 0 16.7 52.1 52.0 6/27/06 34 0 16.7 52.1 52.0 6/27/06 34 0 16.7 52.1 52.0 6/27/06 34 0 16.7 52.1 52.0 6/27/06 34 0 16.7 52.1 52.0 6/27/06 34 0 52.0 6/27/06 34 0 52.0 6/27/06 34 0 52.0 6/27/06 34 0 52.0 6/27/06 34 0 52.0 6/27/06 34 0 52.0 6/27/06 34 0 52.0 6/27/06 34 0 52.0 6/27/06 34 0 52.0 6/27/06 34 0 52.0 6/27/06 34 0 52.0 6/27/06 34 0 52.0 6/27/06 34 0 52.0 6/27/06 34 0 52.0 6/27/06 34 0 52.0 6/27/06 34 0 52.0 6/27/06 34 0 52.0 6/27/06 34 0 52.0 6/27/											
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10/16/06 34 5-6lb/10g 81 92.3 19.4 10/18/06 34 5-6lb/10g 27 118 <5.00	10/2/06	34	0	24	16.8	<5.00					
10/18/06 34 5-6lb/10g 27 118 <5.00	10/16/06	34	2-3lb/10 g	41	39.6	2.22J					
11/7/06 35 2-4lb/10g 41 52.7 4.70J 11/20/06 35 2-4lb/10g 24 57.4 <5.00	10/16/06	34	5-6lb/10g	81	92.3	19.4					
11/20/06 35 2-4lb/10g 24 57.4 <5.00	10/18/06				118						
11/30/06 35 5-6lb/10g 636 <50.0											
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12/6/06 35 5-6lb/10g 37 <52.6											
12/18/06 35 2-3lb/10 g 21 24.1 <5.00											
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1/22/07 35 2-3lb/10 g 79 34.6 <5.00											
2/5/07 35 2-3lb/10 g 27 25.9 <5.00											
2/19/07 35 2-3lb/10 g 47 19.6 <5.00											
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			0		15.0	<5.00					

7/23/07	35	0	18	8.65	<5.00 l
8/6/07	0	0	1	191	<5.00 9.19
9/10/07	35	0	23	217	26.4
9/24/07	35	0	18	16.2	19.4
10/10/07	35	2-3lb/10 g	18	5.63	1.15J
10/10/07	35	2-3lb/10 g	18	1190	53.7
11/5/07	35	2-4lb/10g	18	209	7.93
11/19/07	35	2-4lb/10g	18	19.8	24.1
12/3/07	35	2-4lb/10g	18	20.1	<5.00
12/17/07	36	2-4lb/10g	32	87.4	1.20J
1/7/08	36	2-4lb/10g	23	<5.00	<5.00
			23		
1/21/08	36	2-4lb/10g		58	<5.00
2/4/08	36	2-4lb/10g	24	52	<5.00
2/18/08	35 35	2-4lb/10g	83	57	15
3/3/08		5-6lb/10g	580 44	<5.00	<5.00
3/17/08	35	5-6lb/10g		11	<5.00
4/7/08	35	5-6lb/10g	78	10	<5.00
4/12/08	35	5-6lb/10g	240	6.5	NA_
4/13/08	35	5-6lb/10g	100	6.8	NA
4/14/08	35	5-6lb/10g	78	8.2	NA
5/10/08	36	5-6lb/10g	68	75	<5.00
5/27/08	0	0	18	189	<5.00
6/9/08	35	2-4lb/10g	30	77	<5.00
6/23/08	35	2-4lb/10g	580	5.6	<5.00
7/7/08	35	2-4lb/10g	80	194	189
7/10/08	35	5-6lb/10g	140	254	20
7/21/08	35	5-6lb/10g	42	477	<5.00
8/4/08	35	2-4lb/10g	22	108	14
8/18/08	35	2-4lb/10g	36	31	< 5.00
9/1/08	35	2-4lb/10g	25	32	<5.00
9/22/08	35	2-4lb/10g	40	22	<5.00
10/6/08	35	2-4lb/10g	21	20	<5.00
10/20/08	33	2-4lb/10g	21	13	<5.00
11/3/08	35	2-4lb/10g	24	<5.00	<5.00
11/17/08	35	2-4lb/10g	30	28	<5.00
12/1/08	35	2-4lb/10g	24	12	<5.00
12/22/08	33	2-4lb/10g	24	<5.00	<5.00
1/5/09	35	2-4lb/10g	32	7.3	<5.00
1/26/09	32	2-4lb/10g	27	<5.00	<5.00
2/9/09	33	2-4lb/10g	90	<5.00	<5.00
2/23/09	33	2-4lb/10g	31	6	<5.00
3/9/09	34	2-4lb/10g	30	5.7	<5.00
3/23/09	33	2-4lb/10g	30	<5.00	<5.00
4/6/09	32	2-4lb/10g	38	5.8	<5.00
4/20/09	32	2-4lb/10g	243	8.5	<5.00
5/4/09	33	2-4lb/10g	343	8.2	8.7
5/18/09	33	2-4lb/10g	51	6.2	<5.00
6/8/09	35	2-4lb/10g	38	<5.00	<5.00
6/29/08	33	2-4lb/10g	25	9.1	<5.00
7/20/09	32	2-4lb/10g	47	39	<5.00
8/10/09	32	2-4lb/10g	23.7	31	<5.00
9/13/09	32	0	22	8	<5.00
10/12/09	32	0	104	21	<5.00
11/9/09	32	0	45	<50	<5.00
12/7/09	32	0	28	8.2	<5.00
1/10/10	32	0	42	13	<5.00
2/15/10	32	0	87	11.1	<5.00
3/15/10	32	0	35	<5.00	<5.00
4/15/10	32	0	40	9.62	<5.00
5/17/10	32	0	180	11	<5.00
6/13/10	32	0	43	15	<5.00
7/8/10	32	0	33	66	<2
8/19/10	0-20	0	17	16.3	<5.00
9/21/10	34	0	33	28.2	<5.00
10/18/10	37	0	20	14.9	<10.00
11/20/10	37	0	21	4.89	<4.00
12/16/10		0	23.55	6.15	<5.00

1/18/11	27		22.02	2.20	0.00	l			
2/9/11	37 37	0	22.83 26.76	3.39 10.4	2.86 <10.0				
3/17/11	37	0	49.03	14.2	<5.00				
4/19/11	37	0	57.55	12.5	<5.00				
5/2/11		— -	310	11	10.00				
5/3/11			271	8.92					
5/4/11			156	10.8					
5/4/11			123	15.8					
5/5/11			83	18					
5/9/11	37	0	33.91	43.8	<5.00				
6/9/11	0	0	6.8	52.4	<5.00				
7/18/11	0	0	0.575	18.6	<5.00				
8/15/11	0	0	1.004	38.9	<5.00				
9/13/11	0	0	0.132	<5.00	<5.00				
10/18/11		0	23.71	52.4	<5.00				
11/16/11		0	29.64	30.6	<5.00				
12/19/11		0	60.25	11.5	<5.00				
1/19/12	40	0	31.82	<5.00	<5.00				
2/14/12	40	0	40.38	6.68	<5.00				
3/29/12	40	0	50.81	7.95	<5.00				
4/18/12	40	0	22.54	20	<5.00				
5/23/12	40	0	18.18	10.9	<5.00	!			
6/11/12	40	0	17.87	7.13	<5.15				
7/30/12	40	0	15.1	5.68	<5.00	Wei	r Paramete	rs	
8/24/12	40	0	13.75	<5.00	<5.00	рН	Temp	DO %	Distance
9/24/12	0	0	0.4	73.2	<5.00	7.46	17.57	341.9	12
10/15/12	0	0	4.48	26.7	<5.00	7.07	16.08	216.4	15
11/19/12	0	0	0.73	28.8	<5.00	7.85	15.4	209.1	12
12/28/12	0	0	1.22	25	<1.00	7.91	12.46	247.6	12
1/16/13	0	0	3.72	40.5	2.12	6.41	13.08	241.1	12
2/24/13	00	0	4.1	45.3	<1.00	6.71	14.26	256.3	12
3/13/13	0	0	23	18.6	<1.00	7.63	14.02	190.7	12
4/22/13	0	0	21.62	26.7	<1.00	6.72	14.36	214.3	12
5/16/13	0	0	14.33	18.3	<1.00	6.52	14.66	226.8	12
6/21/13	00	00	1.44	22.3	<1.00	6.69	18.26	238	12
7/23/13	0	0	0.934	27.1	<1.00	7.76	19.74	249.7	12
8/23/13	0	0	5.27	65.4	<1.00	6.92	18.33	238.2	12
9/18/13	00	0	1.43	54.6	<1.00	7.72	18.85	196.5	12
10/16/13	0	0	1.63	66.1	<1.00	8.03	15.9	204.7	12
11/13/13	0	0	2.68	115	1.71	7.25	11.72	236.4	12
12/18/13	0	0	43.77	33	1.28	6.65	13.99	25.92*	12 measured as mg/L not as % DO
1/13/14	0	0	48.39	45.8	2.55	7.13	12.36	236.7	12
2/17/14	0	0	6.1	75.4	<1.00	6.47	13.61	259.6	12
3/17/14	0	0	151.5	12.8	2.47	7.1	13.4	121.6	12 Very heavy flow rate
4/23/14	0	0	11.26	49.4	<1.00	6.36	14.88	218.7	12
5/19/14	0	0	56.62	73.9	<1.00 <1.00	7.34 6.68	15.97 17.49	219.1 205.1	12 12
6/4/14 7/9/14	0	0	2.45 2.32	65.7 87.1	<1.00	7.39	17.45	202	12
8/14/14	0	0	0.26	47.6	<1.00	7.68	20.5	214.8	12
9/10/14	0	0	0.25	12.1	<1.00	7.75	18.93	208.7	12
10/22/14	0	0	2.02	137	<1.00	7.73	13.97	199.7	12
11/17/14	0	0	1.71	103	<1.00	7.02	12.2	231.1	12
12/16/14	0	0	13.86	45.9	<1.00	6.82	14	210.1	12
1/13/15	0	0	5.47	88.4	<1.00	7.4	12.24	257.8	12
2/11/15	0	0	2.29	118	<1.00	7.57	12.17	206.4	12
2/11/13		 	2.43	110	1.00	,.07	.2	200.7	
 					1				
		1							

NOTES: Flow rates in gallons per minute (gpm)
O3 injection rates in pounds per 10 gallons
PCP concentrations in parts per billion (ppb)

NA - not analyzed

LE - Lab Error - samples not usable



11701 I-30 Bldg 1, Ste 115 - Little Rock, AR 72209 501-455-3233 Fax 501-455-6118

19 February 2015

Jim Fleer
Oxford Environmental & Safety, Inc
14348 Nieman Rd.
Overland Park, KS 66221

RE: Arkwood Monthly Sampling

SDG Number: 1502169

Enclosed are the results of analyses for samples received by the laboratory on 12-Feb-15 09:30. If you have any questions concerning this report, please feel free to contact me.

Sample Receipt Information:

Custody Seals	•
Containers Correct	~
COC/Labels Agree	
Received On Ice	
Temperature on Receipt	3.0°C

72 orma James / Cheresa Cains

Sincerely,

Norma James

President

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19 February 2015

Jim Fleer Oxford Environmental & Safety, Inc 14348 Nieman Rd. Overland Park, KS 66221

Project: Arkwood Monthly Sampling

Date Received: 12-Feb-15 09:30



Sample Delivery Group - 1502169

One OR more of the qualifiers described below may appear in this report.

QUALITY CONTROL QUALIFIERS:

Qualifier Description E20 Sample used

Sample used as "parent" for the associated analytical batch.

%D3/S-01 / E1 Surrogate failed to recover within acceptance criteria (%D3/S-01).

Results associated with this surrogate were qualified as "estimated" (E1).

B Present in the Associated Blank

B1 Present in Blank, but Not In the Sample.

%D2 / E5 Laboratory Control Spike (LCS) and/or Laboratory Control Spike Duplicate (LCSD) failed to recover with acceptance criteria (%D2).

Associated results were qualified as "estimated" (E5).

%D1 Matrix Spike (MS) and/or Matrix Spike Duplicate (MSD) failed acceptance criteria.

MBA Failed criteria due the high concentration of analyte in the parent sample.

MBI Failed criteria due an interference in the parent sample.

%D3 Quality Control Surrogate failed acceptance criteria.

NREC Quality Control Surrogate failed.

Jim Fleer Oxford Environmental & Safety, Inc 14348 Nieman Rd. Overland Park, KS 66221

Project: Arkwood Monthly Sampling

Date Received: 12-Feb-15 09:30

ANALYTICAL RESULTS

Lab Number: 1502169-01
Sample Name: Mouth
Date/Time Collected: 2/11/15 10:45
Sample Matrix: Water

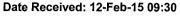
<u>Semivolatiles</u> Pentachlorophenol	<u>Units</u> ug/L	Result 118	Qualifier(s)	Date/Time Analyzed 2/13/15 17:49	<u>Batch</u> A502181	<u>Method</u> 8270D, Rev 4, 2007
2,4,6-Tribromophenol [surr]	%	97.8		2/13/15 16:45	A502181	8270D, Rev 4, 2007
2-Fluorophenol [surr]	%	69.7		2/13/15 16:45	A502181	8270D, Rev 4, 2007
Phenol-d5 [surr]	%	50.0		2/13/15 16:45	A502181	8270D, Rev 4, 2007

ANALYTICAL RESULTS

Lab Number: 1502169-02RE1
Sample Name: Weir
Date/Time Collected: 2/11/15 10:15
Sample Matrix: Water

<u>Semivolatiles</u>	<u>Units</u>	Result	Qualifier(s)	Date/Time Analyzed	<u>Batch</u>	<u>Method</u>
Pentachlorophenol	ug/L	< 1.00	E1	2/18/15 16:42	A502181	8270D, Rev 4, 2007
2,4,6-Tribromophenol [surr]	%	82.7		2/18/15 16:42	A502181	8270D, Rev 4, 2007
2-Fluorophenol [surr]	%	25.5	%D3	2/18/15 16:42	A502181	8270D, Rev 4, 2007
Phenol-d5 [surr]	%	31.5		2/18/15 16:42	A502181	8270D, Rev 4, 2007

Jim Fleer
Oxford Environmental & Safety, Inc
14348 Nieman Rd.
Overland Park, KS 66221
Project: Arkwood Monthly Sampling



QUALITY CONTROL RESULTS

Semivolatiles - Quality Control Analyzed: 13-Feb-15 14:59 By: KR

RPD Reporting Spike Source %REC Analyte Result Limit Units Level Result %REC Limits RPD Limit Notes Batch A502181 - EPA 3510C MS Blank (A502181-BLK1) Prepared & Analyzed: 13-Feb-15 ND 1.00 Pentachlorophenol ug/L 37.7 33-148 Surrogate: 2,4,6-Tribromophenol 40.0 94.1 Surrogate: 2-Fluorophenol 29.4 40.0 73.5 42.5-82.1 30-61 Surrogate: Phenol-d5 20.7 40.0 51.9 Prepared & Analyzed: 13-Feb-15 LCS (A502181-BS1) 39.6 1.00 40.0 99.0 56-118 Pentachlorophenol ug/L Surrogate: 2,4,6-Tribromophenol 39.9 40.0 99.8 66-132 Surrogate: 2-Fluorophenol 28.1 40.0 70.2 41-72 Surrogate: Phenol-d5 23.0 40.0 57.5 29-58 Matrix Spike (A502181-MS1) Source: 1502150-03 Prepared & Analyzed: 13-Feb-15 Pentachlorophenol 31.9 1.00 ug/L 40.0 1.25 76.6 59.5-122 55.9-134 Surrogate: 2,4,6-Tribromophenol 30.5 40.0 76.2 40.0 Surrogate: 2-Fluorophenol 17.9 44.8 17.1-87.4 Surrogate: Phenol-d5 14.8 40.0 37.0 14.7-66.9 Prepared & Analyzed: 13-Feb-15 Matrix Spike Dup (A502181-MSD1) Source: 1502150-03 34.3 1.00 ug/L 40.0 1.25 82.7 59.5-122 8.94 Pentachlorophenol 7.28 40.0 75.1 Surrogate: 2,4,6-Tribromophenol 30.0 55.9-134 17.7 40.0 44.2 17.1-87.4 Surrogate: 2-Fluorophenol Surrogate: Phenol-d5 14.4 40.0 36.0 14.7-66.9

QUALIFIER(S)

*%D3: Surrogate Percent Recovery Does Not Meet Laboratory Acceptance Criteria

*E1: Estimated Result Due to Surrogate Failure

All Analysis performed according to EPA approved methodology when available:

Morma James / Cheresa Coins

SW 846, Revised December, 1996; EPA 600/4-79-020, Revised March, 1983; Standard Methods.

Instrument calibration and quality control samples performed at or above frequency specified in analytical method.

Reviewed by:

Norma James and/or Teresa Coins Technical Director and/or QA Officer

This report must be reproduced in its entirety.

Arkansas Analytical



11701 Interstate 30, Bldg. 1, Ste. 115

Little Rock, AR 72209 PHONE: 501-455-3233 FAX: 501-455-6118

CHAIN OF CUSTODY RECORD

																			
CLIENT INFORM						Project Description			Turnaround Time	ļ			Preservation Codes:						
	nental & Safety	, Inc.				Arkwood Monthly Sampling			1 Day (100%)	1. Cool, 4 Degrees Centigrade						rination			
14348 Nieman R	ld.								.2 Day (50%)	2. Sulfu	ric Acid	(H ₂ SO ₄)), pH < 2 5. Hydrochloric Acid(HCl)				CI)		
Overland Park K	(S 66221					Reporting Information			3 Day (25%)	3. Nitri	c Acid (H	NO₃), p	H < 2			6. Sodiu	OH), pH > 12		
							Telephone	913-706-3422	5 Day (Routine)	<u> </u>		TES	T P	ARA	MET	ERS			Bottle Type Code
Attn: Jim Fleer						Email: jfleer@oxfordeands.com			Preservative Code:	1									G = Glass; P = Plastic
<u> </u>								Bottle Type:	GA									V = Septum; A = Amber	
Sampler(s) Signature Sampler(s) Print						orophenol									Arkansas Analytical Work Order Number:				
Field	SAMPLE C	OLLECTION			Number			SAMPLE) gc								Ì	
Number	Date/s	Time/s	Grah	Comp	of	Sample Matrix	IDE	NTIFICATION/ DES	CRIPTION	Pentach (8270D)									1502.169
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. Relinquished by	: (Signature)	Date/Time		2. Red	eived	by: (Signature) SAMPLE CONDITION UPON			CONDITION UPON I	RECEIP	r in lab	,	REMARKS / SAMPLE COMMENTS						
- (A)		2/11/15			\ I			1. CUSTODY SI	ALS:	ALS: Yes No			Flow Rate - 2-29						
been V	しつ				edi	2 \ /		2. CONTAINERS				j							
		11:30		1	-6(1	Uχ				+'	1			O ₃ Power - 20%					
					3. COC/LABELS	AGREE:		YesNo O ₃ Conc - (, O ₁ O											
					(Signature)	4. RECEIVED O			s1	Vo	O₃ Residual - 3 × 24-								
()	,	2/2/5-		2	id	hul	,	5. TEMPERATU	MPERATURE ON RECEIPT: 300										
tedes	(ACION		7				6. TEMPERATU	REGUNID: 177	REGUNID: ITHT #2				~~··				<u></u>	
feder 21215 - S. 0930) (FOR COM			COMPLETION BY LAB ONLY											